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To: <wvogl@samhsa.gov>  
Date: 7/10/2004 9:50 AM  
Subject: Revised Mandatory Guidelines FR DOCKET 04-7984

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Dear Dr. Vogel:

I have recently learned that the HHS/SAMHSA has proposed new rules around drug testing in the workplace for Federal employees. It is my understanding that these proposed rules do not include provisions for non-urine tests. While the proposed rules only relate to Federal employees, corporations and other non-governmental employers often adopt the same or similar Federal rules.

As a therapist at the Joseph J. Peters Institute in Philadelphia, I have worked with clients who find it difficult, if not impossible to provide urine samples, or to urinate in public. Clinically, this disorder is called paruresis. These clients want to be able to provide urine samples but are unable to do so. The rules need to be changed to allow for the use of alternatives, such as fluid, sweat, or hair tests, which are as accurate (if not more so). I find it troubling, if not unfair, that persons could be penalized for their inability, not their refusal, to provide urine samples. I implore you to do what you can to help rethink the proposed rules by HHS/SAMHSA.

Thank you.

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